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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED

08 FEB -8 PM 5:06

UNITED STATES OF AMERICA,
Plaintiff

vs.

Ma Guadalupe CONTRERAS-Cervera
Defendant.

Magistrate's Case Number:

08 MJ 0371

COMPLAINT FOR VIOLATION OF:

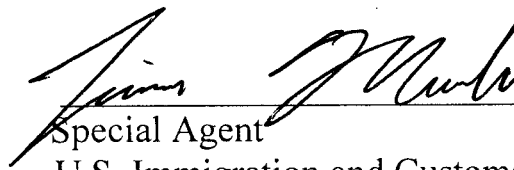
Title 21, United States Code
Section(s) 952 and 960-
Importation of a Controlled Substance
(Felony):

The undersigned complainant being duly sworn states:

COUNT ONE

That on or about February 8, 2008, within the Southern District of California, defendant Ma Guadalupe CONTRERAS-Cervera did knowingly and intentionally import approximately 17.75 kilograms of Cocaine, a schedule II controlled substance into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, incorporated herein by reference.


Special Agent

U.S. Immigration and Customs Enforcement

Sworn to before me and subscribed in my presence this 8th day of February, 2008.


UNITED STATES MAGISTRATE JUDGE

CEM

United States of America

vs.

Ma Guadalupe CONTRERAS-Cervera

{STATEMENT OF FACTS}

These facts are based on written and oral statements received from other law enforcement officers. I submit that the facts contained in this statement demonstrate that probable cause exists to believe that the Defendant named in the attached complaint committed the crimes charged in the complaint.

On February 8, 2008, at approximately 8:25 AM, Ma Guadalupe CONTRERAS-Cervera applied for entry into the United States from Mexico at the San Ysidro Port of Entry. CONTRERAS was the driver and sole occupant of a blue 2001 Chrysler 300 M with Baja California/ Mexico license plate number AHF5171. United States Customs and Border Protection Officer (CBP) Canine Enforcement Officer (CEO) Delgado was conducting preprimary operations when his Narcotics Human Detector Dog (NHDD) alerted to the presence of narcotics emanating from the dashboard area of the vehicle driven by CONTRERAS. CBP/CEO Delgado notified CBPO R. De Jesus of the K-9 alert. CBPO De Jesus received a negative declaration from CONTRERAS. CBPO De Jesus obtained a declaration of Mexican citizenship from CONTRERAS and she presented a DSP-150 Border Crossing Card (TJT000588880). CONTRERAS stated that the vehicle belonged to her husband and that she was going to the airport to pick up her husband. CBPO De Jesus escorted CONTRERAS to the security office where a pat down was conducted. The vehicle was escorted to secondary for further inspection.

Inspection of the vehicle by CBPO R. Hernandez resulted in the discovery and seizure of fifteen (15) packages, which contained a substance that field-tested positive for cocaine, a Schedule II controlled substance, with an approximate weight of 17.75 kilograms. The packages were discovered hidden inside the dashboard area of the vehicle.

CONTRERAS was arrested for violating Title 21, United States Code, Sections 952 & 960-Importation of a controlled substance. CONTRERAS was processed and subsequently booked into the Metropolitan Correctional Center, San Diego, California, pending judicial proceedings.